



WASHINGTON STATE
GAMBLING COMMISSION

Field Operation Rule Interpretation

Question: Can a dealer accumulate tips on the table prior to depositing them into the tip container?

CITE: WAC 230-40-855(2)(5) Acceptance on tips from patrons for house-banked activities.

SUMMARY

Issue:

House-banked card room operators have requested authorization for dealers to accumulate tips on the table to the point where they can "color up" and then deposit in the tip container. If dealers are forced to deposit each tip as received the containers will fill up quickly causing a delay in the game while they go cash out. It may also deplete the supply of \$1 chips in the chip tray causing additional fills from the cage.

Reasoning:

WAC 230-40-855 (2) requires procedures to ensure acceptance of tips is observed by the floor supervisor and surveillance. Procedures are required to include an overt display of tips received such as tapping the table with the tip prior to placing it in the tip container. The rule does not speak to whether tips must be immediately placed in the tip container or can be accumulated and colored up before depositing.

Decision:

Dealers may accumulate tips on the table and color up before depositing in the tip container. Procedures must be documented in the internal controls. The procedures must include how tip acceptance will be observed by the floor supervisor and surveillance and the overt display required when a tip is received. The chips received as tips must be kept apart from other chips on the table. Procedures should also include at what point they must be colored up and deposited in the tip container. For example, dealers may accumulate up to five \$1 chips and then color up to a \$5 chip that is deposited in the chip container.

Approved:

Cally Cass
Cally Cass, Assistant Director
Washington State Gambling Commission

Date:

6/24/05